

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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WILSON RODGRIGO VILLENA SANCHEZ,
GUSTAVO GALARZA and ANDRES LUNA,

AFFIDAVIT

Plaintiffs,

-against-

Index No. 17-CV-455 (AJN)

DPC NEW YORK INC., d/b/a DP CONSULTING),
PD CONSULTING CORP. (d/b/a DP CONSULTING),
THOMAS PEPE and CHRISTOPHER PEPE,

Defendants.

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DPC NEW YORK INC., d/b/a DP CONSULTING),
PD CONSULTING CORP. (d/b/a DP CONSULTING),
THOMAS PEPE and CHRISTOPHER PEPE,

Third-Party Plaintiffs,

-against-

ANDR SERVICES GROUP INC. and MARCELO
ANDRADE,

Third-Party Defendants.

STATE OF NEW YORK)
)ss.:
COUNTY OF NEW YORK)

GUSTAVO GALARZA, being duly sworn deposes and says:

1. Your Deponent is one of the named Plaintiffs in the within matter. I am fully familiar with the facts and circumstances of this matter.
2. After careful review and consideration of this matter I have agreed with the Defendants that I will settle my case for the sum of \$ 25,000.00. This is a fair and equitable settlement for my claims and represents a premium over what I am actually due and owing.
3. I have told my attorney that I want to settle my claim. My attorney refuses to allow me to settle the claim and he keeps telling me that he will decide the amount of the settlement and that I have no say in settling this matter.
4. My lawyer has refused to let me decide the outcome of my claim.
5. Also, during the period of the lawsuit I worked for the Third Party Defendant, ANDR Services Group, Inc. and not for DPC.
6. It has additionally been agreed that the \$ 25,000.00 will be paid to me and

Defendants will

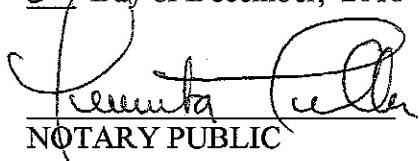
pay in addition to the \$ 25,000.00 whatever legal fees are to be paid to my attorney.

7. No one has forced me to agree to this settlement figure and I am doing this voluntarily.



GUSTAVO GALARZA

Sworn to before me this
21 Day of December, 2018



Jenniba Silla
NOTARY PUBLIC

JENNIBA SILLA
NOTARY PUBLIC-STATE OF NEW YORK
No. 01S16297629
Qualified in Kings County
My Commission Expires 02/24/22